

LAW OFFICES

CARSON

& COIL, P.C.

515 East High Street, P.O. Box 28  
Jefferson City, MO 65102

573-636-2177  
Fax No. 573-636-7119

Michael P. Riley  
Ronald R. McMillin  
Eugene G. Bushmann  
James W. Gallaher  
Lori J. Levine  
Ludolph A. Veith  
Michael Madsen  
R. Max Humphreys

Mark A. Ludwig  
Dana L. Frese  
Edward C. Clausen  
Carla G. Holste  
Kent L. Brown  
Douglas W. Hennon  
Charles J. McPheeters  
Paul Graham

Charles A. "Chip" Gentry  
James W. Gallaher, Jr.  
Darin J. Patterson

Forrest P. Carson 1910-1981  
Cullen Coil 1907-1989

RECORDS DEPT.

August 31, 2000

FILED

SEP - 1 2000

HAND DELIVERED

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
Truman Building, Fifth Floor  
301 West High Street  
Jefferson City, MO 65101

Missouri Public  
Service Commission

Re: Case No. EM-2000-753

Dear Mr. Roberts:

Enclosed for filing with the Commission are an original and fourteen (14) copies of the Intervention of Enron Energy Services (Enron) in the above referenced case.

Please file stamp the additional copy for my file. Also please include both Janene Migden and me on the service list for this case.

Thank you for your assistance in bringing this filing to the attention of the Commission and please call us if you have any questions.

Janine L. Migden  
Senior Director  
Enron Corp.  
400 Metro Place North  
Dublin, OH 43017

Very truly yours,

*Eugene G. Bushmann*  
Eugene G. Bushmann

EGB:fs  
Enclosure

RECEIVED

AUG 31 2000

Records  
Public Service Commission

FILED

SEP - 1 2000

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

In the matter of the application of Kansas City )  
Power and Light Company for an Order Authorizing )  
The Transfer of Certain Electric Generation Assets )  
Used to Provide Electric Service to Customers )  
In Missouri and other Relief Associated with )  
Kansas City Power & Light Company's Plan to )  
Restructure Itself into a Holding Company, Regulated )  
Utility Company, and Unregulated Subsidiary. )

Missouri Public  
Service Commission

Case No. EM-2000-753

**MOTION TO INTERVENE  
OF  
ENRON ENERGY SERVICES**

---

Enron Energy Services (Enron) respectfully requests that the Public Service Commission of Missouri (PSC) grant its late intervention in this proceeding. Enron has recently become aware of the proceeding, which is in its initial stage. As a power marketer interested in providing energy services to customers in Missouri, Enron has a real and substantial interest in these proceedings and would like to participate in the collaborative process and subsequent hearing on any unresolved issues proposed by Kansas City Power and Light (KCPL). As KCPL asserts in its Application, its filing is unprecedented in Missouri and raises many complex issues. Enron believes that the resolution of the issues identified could have a profound impact on the course of the electric restructuring in Missouri. Enron's participation in the proceeding will enhance the record in this matter by providing an additional viewpoint for the commission's consideration.

Enron is one of the world's leading electricity, natural gas and communications companies. The company, which owns approximately \$34 billion in energy facilities worldwide, delivers physical commodities and financial and risk management services to customers around the world, and is developing an intelligent network platform to facilitate online business. Enron's Internet address is [www.enron.com](http://www.enron.com) and the stock is traded under the ticker symbol, "ENE."

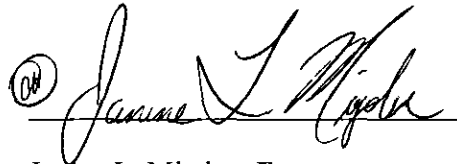
30

Wherefore, Enron respectfully requests that this intervention in the above-styled proceeding be granted.

Respectfully submitted,

A handwritten signature in cursive script, reading "Eugene G. Bushman", written over a horizontal line.

Eugene G. Bushman (17111)  
Carson and Coil, P.C.  
515 East High  
P.O. Box 28  
Jefferson City, Missouri 65102  
(573) 636-7199

A handwritten signature in cursive script, reading "Janine L. Migden", written over a horizontal line. To the left of the signature is a small circular stamp containing the letters "JLM".

Janine L. Migden, Esq.  
Sr. Director  
Enron Corp.  
400 Metro Place North  
Suite 310  
Dublin, OH 43017  
(614) 718-6335